



1355 Willow Way, #253
Concord, CA 94520

August 22, 2008

Ms. Mary Nichols, Chairman
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Subject: Climate Change Draft Scoping Plan

Dear Chair Nichols and Members of the Board:

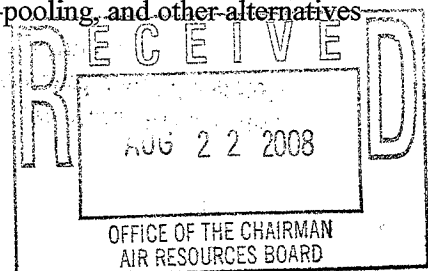
The Contra Costa County Mayors Conference and the Contra Costa Council are please to have this opportunity to provide comments on the Draft Scoping Plan. We share your board's and the state's commitment to addressing climate change and moving towards a clean energy future.

The Contra Costa County Mayors Conference is composed of the Mayors of the nineteen cities in Contra Costa County. Its purpose is to be an educational forum for elected officials and a place to network and exchange information. The Conference also takes positions on issues affecting member agencies. The Contra Costa Council is a public policy advocacy organization whose mission is economic vitality and quality of life. Its membership includes business and industry, education, labor, and nonprofit organizations.

Our comments address primarily **Local Government Actions and Regional GHG Targets and Economic Considerations.**

Local Government Actions

- The Scoping Plan recognizes that transportation represents the most significant component of greenhouse gas (GHG) emissions, and local government land use decisions actually have a relatively minor impact. Therefore, in setting transportation targets the Plan should not overly burden cities and counties. It will be more efficient to address goals and targets at a state and federal level.
- The Plan should support providing incentives and tools for local government to reduce vehicle miles through land use and transportation policies, similar to those contained in SB375.
- The Plan should support expansion of existing transit service, car-pooling, and other alternatives to single-passenger automobile use.



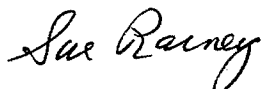
- Traffic on routes of regional significance should be allocated across the region as opposed to counted against individual jurisdictions through which the road passes.
- Actions to achieve GHG reduction should always be viewed in the context of other public policy goals, such as economic development, housing, and mobility to recognize secondary effects and avoid unintended consequences.
- How GHG reductions are measured and accounted for is critical. We encourage the Air Board to complete its Local Government Operations Protocols project at the earliest possible time. Best Practice approaches should be encouraged without mandating specific actions. Goal achievement should drive this effort, not process.
- Regional transportation plans and housing need allocations should be integrated. If future housing development needs to be concentrated near transportation and employment centers to reduce commute driving, the traditional fair share approach to RHNA must be altered.
- Agencies must recognize that more infill development will require improved infrastructure. The customary approach of having development pay for all such infrastructure will not work.
- Permitting and the CEQA process must be simplified to help achieve GHG reductions. The Board should support a streamlined CEQA process for sustainable site projects.
- While public transportation support must be enhanced, it is critical that existing infrastructure, especially local roads, continue to be maintained.

Economic Considerations

- The Plan should support and fund removing barriers to developing and investing in alternative energy sources.
- Prior to adoption of specific policies or measures, a comprehensive, accurate cost-benefit analysis must be completed to determine the true impacts on the state's economy and accurately calculate likely savings.
- We recommend greater emphasis on market mechanisms to achieve reductions and less on command and control actions. Experience shows that markets are more effective in stimulating technological innovation and reducing costs.
- The Plan should ensure that state and local agencies do not duplicate programs, regulations or fees. This will create regulatory confusion and weaken CARB's statewide effort.
- The Plan should recognize and give credit to past and current efforts of particular industries to address GHG emissions (e.g., use of alternative fuels, introduction of more efficient equipment and operations).

We appreciate the opportunity to comment on the Draft Scoping Plan and look forward to doing our part to address climate change and reduce greenhouse gas emissions.

Sincerely yours,



Sue Rainey, Chair
Contra Costa County Mayors conference



Linda Best, President and CEO
Contra Costa Council